

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER, WILLIS  
MCGAHEE, MICHAEL MCKENZIE, JAMIZE  
OLAWALE, ALEX PARSONS, ERIC SMITH,  
CHARLES SIMS, JOEY THOMAS, and LANCE  
ZENO, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY & SURVIVOR  
BENEFIT PLAN; THE NFL PLAYER  
DISABILITY & NEUROCOGNITIVE BENEFIT  
PLAN; THE BERT BELL/PETE ROZELLE NFL  
PLAYER RETIREMENT PLAN; THE  
DISABILITY BOARD OF THE NFL PLAYER  
DISABILITY & NEUROCOGNITIVE BENEFIT  
PLAN; LARRY FERAZANI; JACOB FRANK;  
BELINDA LERNER; SAM MCCULLUM;  
ROBERT SMITH; HOBY BRENNER; and  
ROGER GOODELL,

Defendants.

Case No. 1:23-cv-00358-JRR

**PLAINTIFFS' MOTION TO EXTEND THE DEADLINES FOR THEIR SUMMARY  
JUDGMENT OPPOSITION AND CLASS CERTIFICATION REPLY PAPERS AND  
THEIR RULE 26(a)(2) EXPERT DISCLOSURES, APPOINTMENT OR DESIGNATION  
OF A MAGISTRATE JUDGE OR SPECIAL MASTER TO OVERSEE  
DISCOVERY, AND CONVENING OF AN IN-PERSON STATUS CONFERENCE**

Pursuant to Federal Rule of Civil Procedure ("Rule") 16(b)(4) and Local Rule ("LR") 105.9 of this Court, Plaintiffs hereby respectfully move the Court to extend *sine die* the deadlines for their class certification reply papers, their papers in opposition to Defendants' three summary judgment motions, and their Rule 26(a)(2) expert disclosures. In addition, Plaintiffs respectfully request that the Court appoint a Magistrate Judge or a Special Master to oversee discovery. Lastly, Plaintiffs

respectfully request that the Court convene an in-person status conference to address all of these matters, which are interrelated.

The reasons supporting this motion are set forth in the accompanying memorandum of law and the supporting declaration of Benjamin R Barnett. A proposed Order also accompanies this motion.

As required by LR 105.9, Plaintiffs' counsel have conferred with Defendants' counsel concerning the relief requested herein. Defendants' counsel have advised Plaintiffs' counsel that Defendants do not consent to the requested relief.

WHEREFORE, Plaintiffs respectfully request that the Court suspend *sine die* the due dates for Plaintiffs' reply papers in support of their class certification motion (ECF No. 102), their papers in opposition to Defendants' three summary judgment motions (ECF Nos. 115, 123, 125), and their Rule 26(a)(2) expert disclosures (ECF No. 120); and appoint a Magistrate Judge or Special Master to oversee discovery. In connection with the foregoing, Plaintiffs respectfully request that the Court convene an in-person status conference to address these matters, which are interrelated.

Dated: December 20, 2024

Respectfully submitted,

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